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Before The
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of

Petition for Declaratory Ruling and Request for Expedited
Action on July 15, 1997 Order of the Pennsylvania Public
Utility Commission Regarding Area Codes 412, 610, 215, and
717

File No. NSD-L-97-42

Implementation of the Local Competition Provisions of the
Telecommunications Act of 1996

CC Docket No. 96-98

COMMENTS OF SBC COMMUNICATIONS INC.

In its Pennsylvania Numbering Order,¹ the Commission took a major step toward ensuring that all carriers have access to the numbering resources that they need to compete in local exchange markets. In that Order, the Commission clarified the limited role of state commissions in numbering administration and repeatedly emphasized that state commissions need to implement area code relief in a timely manner. That decision promises to establish a framework for a uniform national numbering system, a system that will ensure sufficient numbering resources are available for all carriers on a nondiscriminatory basis in the future.

SBC Communications Inc. ("SBC")² fully supports the major tenants of the Pennsylvania Numbering Order, and believes that the decision was absolutely essential if the Commission was to meet its goal of ensuring telecommunications resources are available on an efficient, timely basis to telecommunications carriers.³ Although SBC requests reconsideration

¹ Memorandum Opinion and Order and Order on Reconsideration [FCC 98-224] (released Sept. 28, 1998).

² Including SBC affiliates Southwestern Bell Telephone Company, Pacific Bell, Nevada Bell, Southwestern Bell Wireless, and Pacific Bell Wireless.

³ See 47 C.F.R. § 52.9(a)(1).

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and clarification of aspects of the order,⁴ it fully supports the fundamental findings and conclusions of the Order with respect to the administration of numbering resources. These findings and conclusions are well reasoned and necessary, and should be upheld.

The other petitions for reconsideration in this file, however, seek to overturn the central findings of the Pennsylvania Numbering Order.⁵ Some of these petitions attempt to do even more, challenging the basic division of authority between area code relief and numbering administration established in the Second Local Competition Order⁶ and suggesting that state commissions are better suited than this Commission to decide issues involving numbering administration.⁷ None of the arguments raised in these petitions should give the Commission any reason for pause; all of the arguments were addressed in the Pennsylvania Numbering Order. Accordingly, these these petitions should be denied.

The arguments advanced in favor of state commission authority over number administration functions only underscore the wisdom of the Commission's findings in the Pennsylvania Numbering Order. Several state commissions, joined by NARUC, continue to contend that state commissions should be given greater authority over number administration and

⁴ See Petition for Reconsideration and Clarification by SBC Communications Inc (filed Dec. 16, 1998). SBC does not argue the issues raised in its petition in these comments, but it will respond to arguments filed in response to its petition in its reply comments.

⁵ See Petition for Reconsideration by the California Public Utilities Commission and the People of the State of California (dated Nov. 5, 1998) [*CaPUC*]; [Colorado Public Utilities Commission] Petition for Clarification of Memorandum Opinion and Order and Order on Reconsideration (undated); Motion for Reconsideration by the Connecticut Department of Public Utility Control (dated Nov. 30, 1998) [*CDTPUC*]; Motion for Reconsideration by the Maine Public Utilities Commission (dated Oct. 30, 1998); Massachusetts Department of Telecommunications and Energy's Petition for Reconsideration of the FCC's September 28, 1998 Order (dated Oct. 27, 1998); [New Hampshire Public Utilities Commission] Petition for Reconsideration (dated Dec. 14, 1998) [*NHPUC*]; Petition for Reconsideration by the Pennsylvania Public Utility Commission (dated Dec. 15, 1998) [*PaPUC*]; Petition for Reconsideration by the Public Utility Commission of Texas (dated Dec. 15, 1998); Request for Clarification and/or Reconsideration of the National Association of Regulatory Utility Commissioners (served Dec. 16, 1998) [*NARUC*]; Petition of the California Cable Television Association for Reconsideration (dated Dec. 15, 1998); [Media One Group] Petition for Reconsideration (dated Dec. 9, 1998).

⁶ Implementation of the Local Competition Provisions of the Telecommunications Act of 1996, CC Docket No. 96-98, *Second Report and Order and Memorandum Opinion and Order*, 11 FCC Rcd 19392 (1996).

conservation efforts precisely so that they can avoid having to make area code relief decisions.⁸

The Commission could not have been more clear that area code relief and conservation should not be confused: "Conservation methods are not area code relief and it is important that state commissions recognize the distinction and implement area code relief when it is necessary."⁹ It is obvious that, if the Commission grants these petitions for reconsideration, the confusion will continue, and area code relief decisions will increasingly be delayed in the name of "conservation," leading to greater and greater shortages of numbering resources in areas throughout the nation. That is precisely the harm that the Pennsylvania Numbering Order promised to avoid, and that promise will not be fulfilled if the petitions are granted.

In arguing for authority to ration NXX codes over an extended period, even prior to the adoption of area code relief plans,¹⁰ the petitions similarly miss the entire point of the Pennsylvania Numbering Order. The Commission properly was concerned that rationing not be used as a means to artificially extend the life of area codes and thereby delay the date needed for relief. As the Commission recognized, entering jeopardy is a failure of the area code relief process, one that, if it occurs, must be immediately corrected: "[w]hen an area code is in jeopardy, a decision on area code relief (*i.e.*, a geographic split, an overlay, or a rearrangement of area code boundaries) should occur promptly, and through an orderly process."¹¹ It is absolutely unacceptable to deny carriers the numbers they need, as the Commission made clear: "State

⁷ See, e.g., *PaPUC* at 2, 4, 7; *CaPUC*, at 16; *CDTPUC*, at 4.

⁸ See, e.g., *NHPUC*, at 3 ("[i]f the NHPUC had been authorized to impose conservation measures which could delay jeopardy, New Hampshire might never have needed to plan for a new area code"); *MaPUC*, at 4 ("[i]f Maine is allowed to impose number conservation plans which would delay the need for area codes until after the advent of number portability, Maine might never need a new area code, or could at least defer the need for many years"); *PaPUC*, at 6.

⁹ Pennsylvania Numbering Order, at ¶ 22.

¹⁰ See, e.g., *CaPUC*, at 13; *PaPUC*, at 3-7; *NARUC*, at 2-4.

¹¹ Pennsylvania Numbering Order, at ¶ 38.

commissions, by declining to implement area code relief, should not put carriers in the position of having no numbers and therefore being unable to serve customers."¹² Granting authority to states to conduct rationing, without any requirement of having an area code relief plan adopted and an implementation date set, could result in rationing becoming a routine part of the area code relief process, to the detriment of carriers and customers alike.¹³ The Commission should not delegate authority to state commissions that would be used to extend rationing – instead, it should ensure that rationing is truly the exceptional event, one that occurs only in rare instances. If such a rare instance occurs before a relief method is adopted and scheduled for implementation, the industry, in conjunction with the NANPA, has the authority to implement a rationing plan under existing industry guidelines.¹⁴

The reconsideration petitions also attempt to create confusion regarding state commissions' role in future numbering related issues. These arguments, however, need not detain the Commission for long. The authority delegated to state commissions over numbering issues is very clear after the Pennsylvania Numbering Order and does not need to be further

¹² *Id.*

¹³ Such is the case in the State of California, where a "perpetual lottery" condition has developed. Several area codes in major metropolitan areas have been in rationing for as long as two years, in some cases even through implementation of one relief plan. However, the extended rationing in some areas has so severely curtailed number assignments that substantial "pent up demand" for CO codes builds up until relief is implemented. This "pent up demand" ends up using up a substantial portion of the CO codes provided by the relief plan, such that relief, when it finally occurs, does not provide sufficient supply to eliminate rationing.

The California PUC contends such a "perpetual lottery" situation is necessary, claiming that it is "absolutely impossible" for it to implement relief when jeopardy is declared under California law. *See CaPUC*, at 13. However, the California PUC is plainly wrong. There is no reason why the California PUC cannot start relief planning early, in order to ensure that relief is implemented (as proposed in the industry guidelines) before jeopardy occurs. If relief is provided in a timely fashion and in a relief plan that provides sufficient relief, the perpetual lotteries in California would end. However, the solution is not for the Commission to give the CaPUC additional authority and further institutionalize California's "perpetual lotteries." Instead, the Commission should maintain its limited delegation of rationing authority, to encourage state commissions to plan area code relief in a timely manner and design relief plans to provide sufficient relief to meet demand.

¹⁴ *See* Industry Numbering Committee, "Central Office Code Assignment Guidelines," at § 9.5 (INC Doc. No. 95-0407-008, reissued Sept. 18, 1998) <www.atis.org/clc/inc>.

clarified or modified. For example, some petitions complain that it is not clear whether states can require rate center consolidation – but, in fact, it is the state's own rate structures that give rise to local rate centers, and those local rate structures can be reviewed by state commissions at any time. What the state commissions may not do is order carriers to return numbering resources as part of implementing any rate center consolidation plan. That issue is left to numbering administration, as it must be if the Commission is to avoid fifty-one different jurisdictions interfering with national numbering administration.¹⁵ States continue to have the authority to certify and decertify carriers; however, when they decertify carriers, they cannot take control of the numbering resources previously assigned to that carrier, but, instead, should work in coordination with NANPA to ensure that the resources are properly returned in accordance with existing industry guidelines.

In sum, the Commission should maintain the central tenants of the Pennsylvania Numbering Order. The arguments made by those who would seek to overturn the decision are without merit and should be denied.

Respectfully submitted,

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February 4, 1999.

¹⁵ Pennsylvania Numbering Order, at ¶ 33.

Certificate of Service

I, Mary Ann Morris, hereby certify that the foregoing "Comments of SBC Communications, Inc." in NSD File No. L-97-42 has been served on February 4, 1999 to the Parties of Record.



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